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6 Attorneys for Defendant Fusion Garage PTE Ltd.

7  
8 UNITED STATES DISTRICT COURT

9 NORTHERN DISTRICT OF CALIFORNIA

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11 INTERSERVE, INC. dba TECHCRUNCH, a  
Delaware corporation, and CRUNCHPAD,  
12 INC., a Delaware corporation,

13 Plaintiffs,

14 vs.

15 FUSION GARAGE PTE LTD., a Singapore  
company,

16 Defendant.  
17

CASE NO. C 09-cv-5812 RS

**FUSION GARAGE'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL**

**(Civil Local Rule 79-5)**

1 Pursuant to Civil Local Rule 79-5, Defendant Fusion Garage PTE, Ltd. hereby submits this  
2 administrative motion for an order to file under seal the following documents attached to the  
3 Declaration of Patrick C. Doolittle in Support of Fusion Garage's Renewed Motion for Protective  
4 Order:

5 Exhibit A is a copy of Plaintiffs' Statement of Misappropriated Business Ideas, served on  
6 April 23, 2010. This statement should be filed under seal because Plaintiffs have designated it  
7 confidential under the Protective Order.

8 Exhibit D comprises relevant excerpts of the deposition of Michael Arrington, whom  
9 TechCrunch designated as their 30(b)(6) witness in the case. These excerpts should be filed under  
10 seal, at least provisionally, because TechCrunch provisionally designated the entire deposition  
11 transcript as highly Confidential-Attorney's Eyes Only (although Fusion Garage disagrees with  
12 this confidential designation and has filed a still-pending motion to remove the confidentiality  
13 designation (Dkt. 66)).

14 Exhibit E is a copy of an April 30, 2010 letter that Fusion Garage's counsel sent to Andrew  
15 Bridges, counsel for Plaintiffs. This letter should be filed under seal because it quotes from  
16 Plaintiffs' Statement of Misappropriated Business Ideas that Plaintiffs have designated as  
17 confidential.

18 Fusion Garage is filing the present motion to maintain Exhibits A, D, and E in confidence  
19 pursuant to the Stipulated Protective Order and in deference to Plaintiffs' designations.

20 Furthermore, Fusion Garage's Renewed Motion for Protective Order quotes and cites  
21 certain portions of Exhibits A, D, and E. Accordingly, Fusion Garage respectfully requests to file  
22 its Renewed Motion for Protective Order under seal as well, and will file in the public record a  
23 redacted version of the Opposition Brief that omits citations and quotations to Exhibits A, D, and  
24 E.

1 DATED: April 30, 2010

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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4 By /s/ Patrick Doolittle  
Patrick C. Doolittle  
Attorneys for Defendant Fusion Garage PTE Ltd.  
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